

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK  
RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

**OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO PUBLIC REPRESENTATIVE INTERROGATORIES  
PR/USPS-T3-33 THROUGH 46**

The United States Postal Service hereby objects to the above-listed interrogatories filed by the Public Representative on April 3, 2012.

Pursuant to the Presiding Officer's Ruling Establishing Procedural Schedule, Ruling No. N2012-1/5 (issued January 12, 2012), the close of discovery on the Postal Service's direct case was February 24, 2012. On March 29, 2012, the Commission issued Order No. 1301, which included an updated procedural schedule for this docket. That Order did not authorize the filing of any additional discovery on Postal Service witnesses beyond the February 24, 2012 deadline.

The interrogatories listed above were directed to Postal Service witness Rosenberg (USPS-T-3). The interrogatories contain preambles that either paraphrase or cite witness Rosenberg's direct testimony (USPS-T-3) or supporting library references, filed on December 5, 2012, or relate to issues discussed in her direct testimony. Having elected not to propound this discovery on or before February 24, the Public Representative has offered no explanation for why it why it could not have submitted these interrogatories by that deadline

or why it should now be permitted to unilaterally extend discovery on the Postal Service's direct case beyond the period established by the Commission.

Accordingly, the Postal Service objects to these interrogatories.

Notwithstanding this objection, the Postal Service is filing responses to PR/USPS-33 through 38 and 40 through 46, and reserves the right to object to interrogatories seeking to follow-up on those responses.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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